

STEWART & STEWART
931 S. Rangeline Road
Carmel, IN 46032
(317)846-8999
Michael J. Sobieray (MS-0310)

Attorney for Creditors, Kelly R. Groce and Kelly D. Groce

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**


-----X	
In re	:
	:
DELPHI CORPORATION, <u>et al.</u> ,	:
	:
Debtors.	:
	:
-----X	

Chapter 11
Case No. 05-44481 (RDD)
Jointly Administered

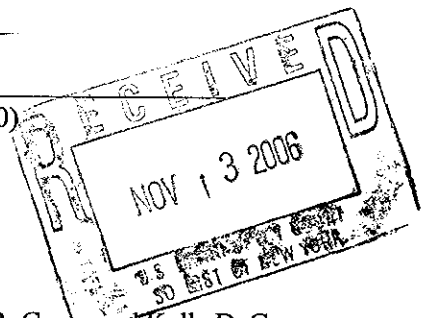
**NOTICE OF CREDITORS, KELLY R. GROCE AND KELLY D. GROCE'S, SETTLEMENT OF
CLAIMS AGAINST DEBTORS**

Please take notice that on October 17, 2006, Creditors', Kelly R. Groce and Kelly D. Groce, and Debtors, Delphi Corporation, et. al., mediated the Creditors' claims for personal injuries, presently on file in the Henry County Circuit Court, in the State of Indiana, captioned Kelly R. Groce and Kelly D. Groce v. Delphi Corporation and GMAC Global Relocation Services, Cause No. 33C01-0401-CT-0004. Desiring to settle fully and finally all matters between them, and after negotiation among the parties, Creditors and Debtors agreed that the Debtors would pay creditors \$35,000.00 in full and final settlement of all claims and that Creditors would expressly release Debtors for all claims arising with respect to the Claim. The parties have agreed as reflected in the mediation agreement attached hereto as Exhibit A.

DATED: November 9, 2006


Michael J. Sobieray (MS-0310)
STEWART & STEWART
931 S. Rangeline Road
Carmel, IN 46032
(317)846-8999

Attorney for Creditors, Kelly R. Groce and Kelly D. Groce



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been duly served upon the following via


First Class, United States Mail, this 9th day of November, 2006:

John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
Brian M. Fern
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive, Ste. 2100
Chicago, IL 60606-1285

Kayalyn A. Marafioti
Thomas J. Matz
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036

Robert J. Rosenberg
Mitchell A. Seider
Mark A. Broude
LATHAM & WATKINS LLP
885 Third Avenue
New York, NY 10022-4802

Lloyd H. Milliken, Jr.
Matthew R. King
LOCKE REYNOLDS LLP
1000 Capital Center South
201 N. Illinois Street
P.O. Box 44961
Indianapolis, IN 46244-0961



Michael J. Sobieray, (MS-0310)
STEWART & STEWART
931 S. Rangeline Road
Carmel, IN 46032
(317)846-8999

STATE OF INDIANA) IN THE HENRY COUNTY CIRCUIT COURT
) SS:
COUNTY OF HENRY) CAUSE NO.: 33C01-0401-CT-0004

KELLY R. GROCE and)
KELLY D. GROCE)
)
Plaintiffs,)
)
v.)
)
DELPHI CORPORATION and)
GMAC GLOBAL RELOCATION)
SERVICES)
)
Defendant.)

MEDIATION AGREEMENT

Plaintiffs, in person and by counsel, and Defendants, by counsel hereby compromise and settle this case as follows:

1. Defendants shall pay the Plaintiffs \$ 35,000⁰⁰ as full settlement for all claims. *THE AGREED SETTLEMENT AMOUNT MUST BE SUBMITTED TO AND APPROVED BY THE U.S. BANKRUPTCY COURT FOR THE S.D. OF NEW YORK, CASE NO. 05-44481 AND THE AMOUNT OF THE SETTLEMENT IF APPROVED CANNOT BE PAID UNTIL DELPHI CORP EMERGES FROM BANKRUPTCY.*

2. Plaintiffs shall sign an appropriate release and satisfy any and all liens and indemnify Defendants as to any liens not paid.

3. The parties shall sign a Stipulation of Dismissal and this case shall be dismissed with prejudice.

4. The mediation costs shall be divided equally between the parties and the mediator shall file a report with the Court.

DATED: 10/17/06

Kelly R. Groce
Plaintiff

Kelly D. Groce
Plaintiff

[Signature]
Attorney for Plaintiff
Tax ID No.: 35-1606383

[Signature]
Attorney for Defendants

James A. Fels
Mediator, James A. Fels

